

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GWENDOLYN EPHRAIM)	
)	
Plaintiff,)	07 C 7164
)	
v.)	
)	Judge Lefkow
CITY OF CHICAGO, et al.,)	
)	Magistrate Judge Denlow
Defendants.)	

**CITY OF CHICAGO’S MOTION TO EXTEND
THE TIME IN WHICH TO ANSWER OR OTHERWISE PLEAD**

Defendant City of Chicago (“City”), by Mara S. Georges, Corporation Counsel for the City of Chicago, respectfully requests that this Honorable Court grant an extension of time up to and including February 29, 2008 in which to answer or otherwise plead to Plaintiff’s Complaint at Law. In support of this motion, the City states as follows:

1. On December 20, 2007, this action was filed containing claims brought pursuant to 42 U.C.S. § 1983 alleging violations of Plaintiff’s constitutional rights.
2. On January 29, 2008, undersigned counsel for the City, Ashley C. Kosztia, was assigned to this matter. That same day she filed her appearance.
4. Upon review, undersigned counsel became aware that the City’s answer or other pleading to the Plaintiff’s Complaint was due on January 28, 2008.
5. As undersigned defense counsel has only recently been assigned to defend this case, she now requests additional time to answer as she must examine the file, confer with her client and draft an answer to Plaintiff’s Complaint.
6. Undersigned counsel has conferred with one of Plaintiff’s counsel, Ms. Katie Z.

Ehrmin, who has no objection to this request.

7. This motion is Defendant's first request for an extension of time to answer or otherwise plead. Such a request will not unduly delay the resolution of the disputed issues, nor will it prejudice the plaintiff.

WHEREFORE, Defendant City of Chicago, respectfully requests that it be given until February 29, 2008 to answer or otherwise plead to Plaintiff's Complaint at Law.

Respectfully submitted,

MARA S. GEORGES
CORPORATION COUNSEL

BY: /s/ Ashley C. Kosztia
ASHLEY C. KOSZTYA
Assistant Corporation Counsel
Attorney for Defendant City

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